

Market Potential 72% Consumer Confidence 82% Energy Savings 69%
3% Energy Efficiency 27% Production Satisfaction 74% Market Share

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Final Report

STAKEHOLDER VIEWS ON FUEL MIX DISCLOSURE LEGISLATION AND EVALUATION OF THE UTILITY REPORTING PROCESS

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TABLE OF CONTENTS

EVALUATION OF FUEL MIX DISCLOSURE REPORTING PROCESS.....	1
INTRODUCTION	1
Survey Method.....	2
FINDINGS	4
Fuel Mix Label Distribution	4
Legislative Requirements	4
Value of Fuel Mix Information	7
Quality of CTED Service	10
The Fuel Mix Product.....	12
CONCLUSIONS AND RECOMMENDATIONS	14
Conclusions	14
Recommendations.....	16
APPENDIX: SURVEY INSTRUMENT	A-1
CTED FUEL MIX DISCLOSURE SURVEY	A-1
Introduction	1
Legislative Requirements	1
Perceptions of Customer and Utility Value	3
Quality of CTED Service and Information	3
Process of Providing Data to CTED	5
Summary.....	5

Table of Contents

EVALUATION OF FUEL MIX DISCLOSURE REPORTING PROCESS

INTRODUCTION

In an effort to provide retail electricity customers with complete information on the fuel source used to generate their power, the Washington State Legislature in 2000 passed EHB 2565, “An Act Relating to the Disclosure of Attributes of Electricity Products.” Similar to efforts in nutrition labeling, uniform food pricing, truth-in-lending and other consumer information programs, the law requires utilities to disclose their resource fuel mix to their retail customers beginning in 2001. Most utilities are required to provide this information at least four times per year: twice via direct mailings such as a bill insert and twice through another publication that contains either the information, a telephone number to request it or an electronic reference to the disclosure. Small utilities or mutual light and power companies are required to provide the information at least once a year through some publication distributed to all customers.

The Washington Department of Community, Trade and Economic Development (CTED) is responsible for implementing the bill as outlined in the Revised Code of Washington (RCW) Chapter 19.29A. CTED’s primary obligation under the statute is to calculate the “net system fuel mix.” This is the fuel mix that is applied to any market purchase a utility uses to serve its retail load. It is calculated by creating a database of generating units in the U.S. Northwest Power Pool and the annual output from these units, then deducting the utilities’ claims on specific units. CTED then calculates the percentage of electricity generated by each fuel source for each utility. For smaller utilities, or those who rely fully on the Bonneville Power Administration, the utilities simply report to CTED their total retail sales in megawatt hours. Bonneville supports the reporting by providing to CTED data on the output from each of the generating units they manage. For larger utilities, or those with multiple sources of electricity, reporting to CTED involves electronic submission—via a website created by CTED and its contractors—of retail sales from various sources (including the specific output by power plant and the volume of electricity supplied through wholesale market purchases).

CTED provides the resulting information to the utilities in a label format that reflects the total percentage of electricity generated by each fuel source for a given utility. This label describes the specific mixture of fuel sources the consumers of each utility purchase—for example, a utility’s fuel mix might be reported as 30% coal, 60% hydro and 10% nuclear. The utilities then distribute these labels to their retail customers in accordance with the statute.

Evaluation of Fuel Mix Disclosure Reporting Process

In November of 2003, CTED's Energy Policy group contracted with a third party evaluator, Research into Action, Inc. to conduct a survey of stakeholders that included the parties outlined in the statute to be part of a working group. These stakeholders include a representative from each of the more than sixty electric utilities in the state, the Attorney General's Office, consumer groups, the Utilities and Transportation Commission, and the environmental community. The goal for the survey was to assess the perceptions of the value of the law, the utilities' experiences in compliance and CTED's management of the process. Additionally, the survey process sought feedback regarding suggested changes to the statute or the reporting process.

Survey Method

CTED staff worked with Research into Action to develop a list of questions. CTED described the reporting process and provided a list of utility contacts and other stakeholders. All contacts were familiar with the legislation or the resulting reporting requirements. Table 1 describes the original list of contacts.

Table 1
SURVEY STAKEHOLDER LIST (N=76)

STATUS	NUMBER	PERCENT
Utility Contacts (Non-Coop Members)	52	68%
Washington Rural Electric Coop Association Members	14	23%
Other Stakeholders	10	16%

An introductory email was sent to all contacts prior to the survey. Due to their small size and the potential burden of participation, members of the Washington Rural Electric Coop Association were not automatically included, but given an opportunity to opt in to the survey. If they did not affirm their desire to participate, they were not contacted. None of the 14 members of the Washington Rural Electric Coop Association chose to directly participate, although their association director participated. From November 17 to December 1, 2003, all contacts were given an opportunity to respond to the survey either electronically or via telephone interview. Table 2 presents the disposition of the survey stakeholder list.

Table 2
DISPOSITION (N=62)*

STATUS	NUMBER	PERCENT
Completed Survey	45	73%
Declined	7	11%
Messages Left/Not Reached for Interview	9	15%
Left Utility	1	2%

* Does not include the 14 Washington Rural Electric Coop Association members who opted out at the beginning of the process.

Non-utility stakeholders were asked the fewest number of questions, followed by utilities that report just total electricity sales to CTED via phone or email. We asked the most questions of utilities that report the generating sources of the electricity they sell. The appendix provides the survey instrument; questions omitted for non-utility stakeholders and utilities reporting total sales are noted.

Those that report only total electricity sales tend to be smaller utilities that obtain all of their power from the BPA. Other utilities must report their electricity sales supplied by each of the following: facilities that they own and operate, purchases from other specific facilities and wholesale market purchases. Surveys of these utilities included questions about their experience reporting data to CTED. A majority of respondents were from utilities that participated in the more complex data reporting process (Table 3).

Table 3
ORGANIZATIONAL STATUS OF SURVEY RESPONDENTS (N=45)

TYPE OF ORGANIZATION	NUMBER	PERCENT
Direct Reporting Utilities	27	60%
Small Utilities	11	24%
Stakeholder Organizations	7	16%

FINDINGS

Fuel Mix Label Distribution

Utilities have several options in how they ultimately report their fuel mix information to their retail customers. The statute specifies that most utilities disclose their resource fuel mix four times a year to their customers, twice through direct mailings and twice through a publication that includes either the label or instructions for receiving the information by telephone or electronically. Small utilities or mutual light and power companies are required to distribute the label only once. The statute also requires that companies marketing the sale of a specific electricity product (e.g., green power) include the disclosure label in their marketing materials. A majority of contacts report using bill stuffers to distribute the label, followed by newsletters, websites and other methods (Table 4).

Table 4
FUEL MIX LABEL DISTRIBUTION METHODS (N=38)¹

METHOD	USING	NOT USING	DON'T KNOW
Bill Stuffer	55%	32%	13%
Newsletter	40%	40%	21%
Website	37%	45%	18%
Other ²	29%	53%	18%

¹ Does not include the seven non-utility stakeholder contacts

² Includes new customer packets, bi-annual magazines, walk-in counter, printing directly on bills and as part of wind marketing.

Legislative Requirements

The implementing statute RCW 19.29A.070 subsection (1) directs CTED to convene a work group of interested parties to suggest modifications, if any, to the disclosure requirements. Few stakeholders indicated an interest or ability to participate in such a work group. Consequently, CTED asked stakeholders to suggest issues or questions for inclusion in a survey to be asked of all stakeholders. The current survey included the questions they proposed.

The survey asked contacts to state their position on several aspects of the current legislative requirements for fuel mix reporting and on potential modifications to those requirements. These are:

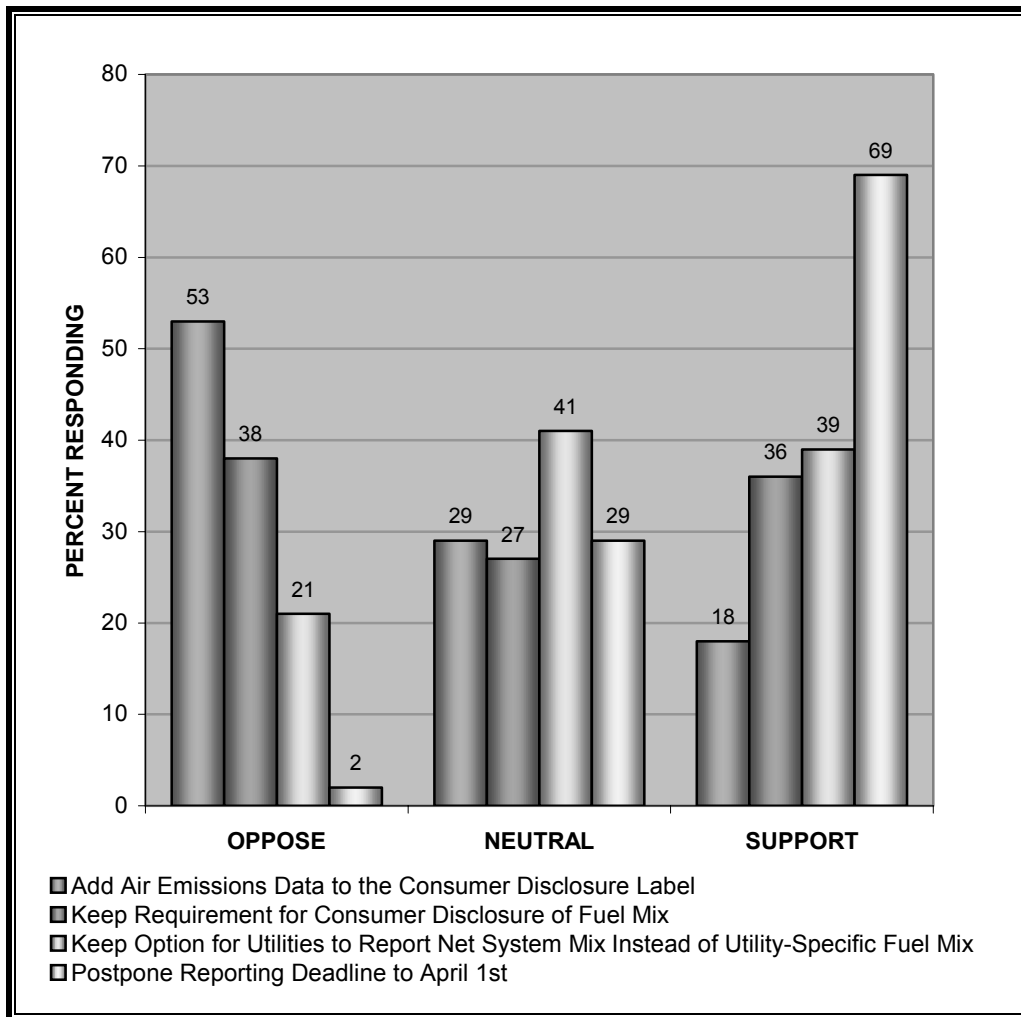
- Adding air emissions data to the consumer disclosure label;
- Keeping the requirement for disclosure of a utility's fuel mix to its customers;
- Keeping the reporting option in place that allows utilities to report net system mix instead of the utility-specific fuel mix; and
- Postponing the reporting deadline by three months, to April 1st of each year.

Respondents rated their views on each issue using a one-to-five scale where one indicates strong opposition to the action and five indicates strong support for the action. Figure 1 provides a comparison of the extent of agreement with each of the four items relating to reporting requirements. The findings are subsequently discussed in detail.

Contacts strongly supported changing the annual reporting date from January 1 to April 1, which would give utilities an additional three months to provide their data on the preceding year. Almost 70% supported this change. Several contacts mentioned that the Federal Energy Regulatory Commission (FERC) required significant data be reported by May 1 and the closer alignment of the two reporting dates would be helpful. One contact expressed concerns about extending the deadline, noting that by the time the data reaches consumers, “It’s already totally out of date and not valuable. It’s a piece of history.” This contact advocated revising the statute to allow utilities to report their power supply plan—their anticipated fuel sources rather than those used in the past.

Responses were split almost evenly between those who supported (39%) and those who were neutral (41%) about the current option of allowing a utility to report to customers the net market mix of the Northwest Power Pool rather than reporting the utility's actual fuel mix. The 21% that opposed this option typically cited concerns about the accuracy of the data reported to customers and the consistency of the reporting process, or mentioned that their utility had worked hard to assure accurate data were reported.

Figure 1
RESPONDENTS' VIEWS ON LEGISLATION AND POTENTIAL MODIFICATIONS



Respondents had diverse opinions on whether or not the requirements for fuel mix disclosure should be maintained. Almost equal percentages of contacts supported maintaining the requirements (36%), opposed the requirements (38%) or were neutral about continuing them (27%).

When asked to suggest potential changes to the statute, six of those opposed to the requirements stated simply that it should be repealed. Two of these contacts suggested that the information be provided through other avenues, either by the electricity generators or by disclosure upon customer request. However, it is not clear from the comments that the information would be available from either source

without the process of fuel mix calculation. Two other contacts opposed to the requirements elaborated with concerns about how the information is used and what the overall value is for consumers. One explained that, “Somebody decided customers wanted the information. We don’t believe this is the case. Rural Washington customers don’t seem to care or want it. The process doesn’t take much effort, but we still question the value.” The other noted, “There was a great hullabaloo when it was passed. Yet who is using this information and for what? Is it just bureaucracy?”

Of the 16 contacts that were neutral to or supportive of the requirements, eight suggested changes in the statute. These included support for moving the timeline, removing the option of reporting the net market mix, making reporting voluntary for small utilities and clarifying particular issues related to surplus power, line losses and green tag sales. One neutral respondent noted the disclosure label would be more valuable if utilities all calculated their resources the same way. She advocated that the state pick a methodology, noting, “If each utility is doing it differently, the numbers start to lose their meaning.”

The strongest opposition came in response to the suggestion that air emissions data associated with fuel mix information be included in the fuel mix disclosure label. Over half of the contacts (53%) reported being opposed to including air emissions information on the fuel mix label, even if CTED were able to use state and federal data for its calculation without requiring additional information from utilities. Somewhat predictably, a high proportion of those that opposed the fuel mix reporting requirements in general also opposed inclusion of air emissions data (14 of 17). However, three of those that supported the fuel mix requirements generally were opposed to including emissions data. Several of these contacts mentioned spontaneously that emissions data could confuse consumers, due in part to the per-ton nomenclature used to report it.

Value of Fuel Mix Information

Contacts reported their views on whether the fuel mix label has value for customers or for their organizations, and about consumer interest in the labels. Responses are shown in Table 5 and discussed subsequently. Note that this line of questioning seeks contacts’ views about customers and does not provide direct feedback from customers themselves. Conclusions about the value customers ascribe to the fuel mix information can only be reliably drawn from customer interviews.

Table 5
PERCEIVED VALUE OF FUEL MIX INFORMATION (N=45)

QUESTION	YES	NO	DON'T KNOW/NO OPINION
Do you think Fuel Mix Disclosure improves consumer understanding of the fuel source of their retail electric service?	67%	22%	11%
Has the fuel mix information been helpful to your organization in any way?	31%	67%	2%
Are you aware of any customer response to the fuel mix labels?	18%	82%	0%

Contacts expressed the most positive views about the value of Fuel Mix Disclosure to consumers. Two-thirds (67%) of contacts believe disclosure improves consumer understanding. These contacts noted that consumers were familiar with information presented in this kind of format and that they lacked access to this data prior to the disclosure requirement. One noted that customers now have an opportunity to get the information and that “this may be the only way.” Another felt that people are used to interpreting information provided in labels and noted that buying and selling in the marketplace requires information.

Of the 30 contacts that said the information was useful to consumers, 12 qualified their assessment with disclaimers such as “if customers read it,” or “to the extent that they use it.” Twenty-two percent of contacts believed the fuel mix disclosure did not improve consumer understanding. Half of these contacts (five people) held the view that people simply did not care about the fuel source of their electricity. Eleven percent of contacts chose not to answer the question, often noting that they had not gotten any feedback from customers so were unable to judge consumer understanding.

The question asking contacts whether or not fuel mix information was helpful to their organization in any way earned initial responses of 67% “no” and 31% “yes,” as reported in Table 5. However, a review of the explanatory comments revealed mixed opinions among contacts in both response categories. In order to more accurately capture contacts’ opinions, we re-categorized the answers to this question by including a third option that allowed for a “mixed” answer. Recounting the responses to reflect this option resulted in 53% “no,” 20% “yes,” and 27% “yes and no” responses.

Nine contacts (20%) reported unambiguously that the information was helpful to their organization. Five of these described the overall value of disclosure, citing improved communication and more accurate information available to ratepayers. Four others mentioned benefits related to tracking and defining the resource mix for the State of Washington, including identifying the mix for their utilities and enabling a comparison with other utilities.

Twelve respondents (27%) were mixed in their answers, offering explanations that seemed to contradict their original *yes* or *no* answer. These respondents were likely to explain that the fuel mix information was helpful, with caveats. The most common positive statement made by this group (five of the twelve) was simply the value of having better information. Contacts were equally likely to cite the value of the information internally (to the utility itself) as to cite the value for consumers (external value). Three of the twelve noted that the information was valuable in marketing wind resources and demonstrating investments in green power.

The comments below represent some of the mixed opinions regarding how useful or helpful the fuel mix information is to a given organization:

- *“I don’t know if I’d call it useful. It is interesting, and does allow information sharing to our customers.”*
- *“Yes and no. We send it out to customers and it allows us to show that we are making in-roads into green power. It’s less useful internally.”*
- *“I don’t think it has been used in a manner to shape or change supply in our utility, but it did remind us that there is quite a bit of coal in the system, something that may not have been intuitive to our managers.”*
- *“We don’t hear much about it. The website staff may hear more. For us it is a data collection requirement, but I do believe it is helpful to know what the content is.”*

Eighty-two percent of contacts were unaware of any customer response to the fuel mix disclosure label. However, most survey respondents were executives or data analysts; few held positions that involved communicating with customers on a regular basis. The 18% who reported some customer response described the reaction as consisting mainly of questions about why the information was being provided, requests for clarification about different fuel sources, and some reaction and surprise at the presence of nuclear power in the mix. Bonneville staff reported that they receive calls every year from their customers about the information they provide, but that Bonneville’s customers are utilities and the calls are from utility staff trying to track down data for their own reporting.

Quality of CTED Service

Contacts reported being pleased overall with the level of support provided by CTED staff and its contractors throughout the disclosure process. Even those opposed to the requirements often noted that the staff has done an excellent job in managing the process, making it clear and straightforward. Table 6 presents responses to questions about the performance of CTED staff with respect to several criteria, rated on a one-to-five scale where five is the most positive response.

Some of the lower ratings on the question of CTED communication may stem from the learning curve of everyone involved during the first year of the requirements. Several respondents spontaneously noted that the process was much smoother in the second year when confusion about the process had been resolved.

Table 6
QUALITY OF CTED SERVICE AND INFORMATION*

PERFORMANCE OF CTED STAFF	POOR ("1" OR "2")	SATISFACTOR ("3")	GOOD ("4" OR "5")
Responsiveness to Your Questions or Requests (N=43)	2%	5%	93%
Knowledge About Utility Generation and Fuel Mix Issues (N=42)	2%	14%	83%
Communication about the Fuel Mix Disclosure Process (N=45)	4%	13%	82%

* The number of respondents varies somewhat in these questions, as some contacts did not have direct experience with various parts of the process.

Larger utilities and those that rely on resources outside the Bonneville system must report their sales per facility and through market purchases via a web reporting system. Those that completed this step were asked several questions about their experience with the process and opportunities for improvement. Using a one-to-five scale, contacts rated various aspects of the data reporting process (Table 7).

Table 7
EXPERIENCE PROVIDING DATA TO CTED (N=27)*

ASPECT	POOR ("1" OR "2")	SATISFACTORY ("3")	GOOD ("4" OR "5")
Effectiveness of Web Reporting	0%	11%	89%
Overall Experience of Providing CTED with Fuel Mix Data	0%	19%	81%
Clarity of Instructions for Reporting by Generating Facility and BPA Mix	7%	22%	70%
Reasonableness of Expectations and Timelines	7%	37%	56%

* Does not include non-utility stakeholders or utilities that report only total sales to CTED (generally full customers of BPA)

Contacts reported being very pleased with the web reporting system; almost 90% rated it as an *effective* or *very effective* way to submit data. Suggestions for improving the website included adding a confirmation page or process to assure the submittal worked. In addition, contacts suggested changing the site so that one does not have to input all of the data at once. This could be accomplished by creating a registration system or some way to save work and return to it.

Overall satisfaction with the data reporting experience was also relatively high, with over 80% reporting the process as generally *good* or *very good*. When asked to describe any difficulties providing data to CTED, three contacts noted issues internal to their organizations involving data that didn't quite fit the questions, trouble categorizing fuel sources and debate about how to figure it out. In the words of one respondent:

"There were some internal conflicts here about assumptions. We essentially had to create special data for that report. The problem is that if you're trying to represent your retail load, but have resources greater than your load, you have to calculate what portion of each resource supplied retail load. We don't routinely try to attribute a specific megawatt of a specific resource to retail load. We had to create a methodology."

Another contact noted that the hardest part of the process was getting data from generators or suppliers, since the load for that utility is served by a variety of sources. Only two contacts mentioned difficulties related to CTED, one noting that a

plant was missing from their report (an error that was quickly resolved) and another recalling some confusion around meeting times and travel details.

Clarity of reporting instructions rated slightly lower than web reporting and overall experience, with 70% rating the instructions *clear* or *very clear*. This comparatively lower proportion likely represents the complexity of the calculations and the learning curve of those involved in initial efforts to report fuel data. One contact noted, “The first year required a few phone calls. This year I made only one or two. The fact that we do it only once a year means a bit of re-learning. With time it will be more familiar.” Clarity and accuracy are intertwined somewhat in the comments and occasionally reflect areas of true confusion regarding consistent and standard methods for calculating the percentage of total resource that serves retail load for utilities with power to sell. Determining whether or not there is a clear methodology for calculating retail load in a supply-rich environment is outside the scope of this assessment, however confusion exists among stakeholders about if and how this complexity is addressed.

Just over half (56%) of contacts found the timelines for reporting fuel mix data *reasonable* or *very reasonable*. This percentage likely reflects previously discussed issues related to the very tight deadline for reporting and the strong support for moving the official deadline to April 1st. Five contacts appealed for extended deadlines and one asked that a deadline reminder be distributed via email.

When asked for suggestions to improve the process, five contacts questioned its value generally, and three advocated repeal of the statute. Two contacts that questioned the value of the requirement went on to note that the process of reporting was fine and they were pleased with the services provided by CTED. One contact who stated, “I don’t think anybody should have to do it. Strike the whole thing,” went on to note, “CTED is great. If other departments were as good as CTED, you wouldn’t hear complaints about the state government.”

The Fuel Mix Product

Contacts used the same one-to-five scale to rate several measures of quality related to the final product provided by CTED—the fuel mix information itself. (See Table 8.) CTED staff earned generally high ratings in clarity, timeliness and accuracy, with less than 10% of contacts rating the fuel mix labels as poor on any of the measures of quality.

Table 8
QUALITY OF FUEL MIX REPORTING PRODUCT

ASPECT OF QUALITY	POOR ("1" OR "2")	SATISFACTORY ("3")	GOOD ("4" OR "5")
Clarity of Information (N=43)	7%	7%	87%
Timeliness of Information (N=41)	2%	24%	73%
Accuracy of Information (N=36)*	0%	28%	72%

* The low response rate reflects the reluctance of some contacts to judge accuracy, especially for those who rely on the Bonneville Power Administration mix.

Contacts gave the highest ratings to CTED for the clarity of the information provided to utilities, with almost 90% rating them a “4” or “5”. One contact noted that CTED staff had improved in their understanding of data collected by the utilities and how it is categorized. Even so, this contact urged CTED to “engage utilities in dialogue about how they track information, as this will help results be more accurate.” One contact stated that the lack of clarity related more to the wording of the statute than to CTED and resulted in utilities having to make judgment calls and wade into the nuances of green tag reporting. Another contact requested an explanation of the sources included in the *Other* fuel category.

In responding to the question aimed to assess CTED’s timeliness, some comments reflected dissatisfaction with the deadline. Thus, dissatisfaction with the reporting deadline likely confounded contacts’ assessments of CTED’s timeliness. One noted that it should be shifted to April, while another said that the entire process was structured to take too long. This latter contact suggested that utilities be allowed to use planned power supply, as the prospective information would be timelier and ultimately more relevant to consumers’ decisions than information about the past.

The timeliness rating is also impacted by extensions granted. CTED extends reporting deadlines in response to utility concerns, something appreciated by utility staff. A consequence of this may be some uncertainty regarding when the final product will be available. A utility manager responsible for public information and communication mentioned this as an issue.

Contacts had the most difficulty judging the accuracy of the fuel mix information ultimately provided to them by CTED. Some noted that accuracy was hard to assess due to reliance on data generated by Bonneville, while others said they were assuming accuracy from CTED. Ultimately, the accuracy of the fuel mix label

Evaluation of Fuel Mix Disclosure Reporting Process

depends on the quality of the utility inputs *as well as* the calculations done by CTED staff. Many contacts were reluctant to assess the accuracy of the inputs and hesitated in their answers. One respondent advocated for some kind of auditing process to assure the accuracy of utility inputs. Reluctance to assess accuracy may also be related to the previously discussed ambiguity in determining the proportion of resources that goes to meet retail electricity load for those utilities that have excess power to sell on the wholesale market. This issue becomes particularly problematic for utilities selling wholesale power at one point in the year and buying it at another.

A more general question addressed overall satisfaction with the fuel mix labels. Two-thirds (68%) believed that the fuel mix statements are reasonable representations of what is happening at their utility.

CONCLUSIONS AND RECOMMENDATIONS

Conclusions

Responses indicate that CTED has done a very good job of implementing and streamlining the reporting process. Utility contacts were pleased with the web reporting system and found the experience relatively simple. Even contacts that opposed the requirement generally noted that CTED was responsive and easy to work with.

There appears to be some controversy over the value of fuel mix disclosure generally among stakeholders. The fact that respondents were almost evenly divided in their position on maintaining fuel mix disclosure requirements may indicate underlying ideological stances about government requirements generally, the importance of the source of electricity generation or the ability of utilities to do much about their generation mix.

Regardless of the ultimate resolution of this controversy, CTED is responsible for implementing the statute through on-going work with individual utilities, the Bonneville Power Administration and other stakeholders. It is important that CTED continue to refine its processes and assure that they are relatively straightforward and clear to utility staff.

Comments elicited through open-ended questions tended to focus on three main issues:

Accuracy and Clarity

These issues tended to relate to the accuracy of the fuel mix information as reported to consumers and included concerns about establishing a consistent methodology for calculating the utility inputs to CTED. While only 21% opposed allowing some utilities to claim the regional market mix, those that did cited concerns about accuracy and fairness. A second concern was related to how hourly, daily and monthly trades are accounted for. Without consistency in calculation, one contact noted, the numbers become less meaningful.

Some of the same issues emerged in appeals for clarity. Issues for clarification included how to account for line losses, what is included in *Other Resources* and how to account for utilities that sell power at one point in the year and purchase it in another. One contact was concerned about claiming the market mix when his utility knew their wholesale purchases were hydropower. Another advocated for a standard label design—something that would clarify the information for consumers.

Value

Many contacts questioned the value of fuel mix disclosure, including the nearly 40% who opposed the statute in general. A high percentage (82%) were unaware of any customer response to the label, noting that if it was important to people they assume they would have heard some feedback. They took the lack of customer response as proof that their customers do not care about the generation source of their electricity. Others felt the label would be more meaningful if other environmental information were included or if *serving size* information were available (for example, the kWh of running an average home in a year).

It is important to note that those contacted for this survey tended to be utility management and data analysis staff (those who work most directly with CTED), not necessarily those who have the most interaction with customers. Any conclusions about customer response would require follow-up conversations with customer service and public information staff, or even customers themselves.

Training and Information

In answering other questions, contacts occasionally mentioned their interest in training and/or having an on-going source of information about fuel mix issues generally. One suggested a voluntary listserv or reference page that could be accessed to learn more about issues related to fuel mix disclosure. Another contact

wanted direct training on exactly what she was supposed to do with the fuel mix information and what it meant.

Recommendations

From our position as an independent evaluator investigating the response of a diverse mix of Washington stakeholders to the fuel mix disclosure process, we propose that CTED or the state legislature may want to consider the following activities:

1. Work to change the statutory reporting date to April 1, giving utilities three additional months to report their data to CTED. Send electronic reminders of all deadlines to the utilities.
2. Work with the utilities that both buy from and sell to the wholesale power market to establish a clear methodology for allocating to retail sales their generated and purchased power.
3. Keep open lines of communication with the utilities and work to clarify issues related to green tags, line losses and market purchases. There is overlap between some of the issues related to clarity and accuracy—improving these processes will likely increase confidence in the accuracy of the information.
4. Continue the web reporting system and add features that allow those reporting data to save their work and return to it. Establish a confirmation page or email notification system for those who report via the website. Consider adding a page with resources or links to further information about fuel mix reporting in general, to be used as a resource for those interested in learning more about issues related to retail fuel mix disclosure.
5. While there was not strong support for including emissions data with the fuel mix information provided by CTED, our understanding is that this data could be provided relatively simply with no further burden on utilities. In the spirit of public information, CTED may want to consider providing the data to utilities for their own use, to be disclosed voluntarily.
6. Consider further investigation of consumer response through interviews with front line and communication staff.

APPENDIX

Survey Instrument

Appendix

CTED FUEL MIX DISCLOSURE SURVEY

My name is _____, and I'm calling from Research into Action on behalf of the Washington Department of Community Trade and Economic Development as part of an effort to evaluate state-legislated utility fuel mix reporting requirements. I'd like to ask you a few questions about your experience with the process. Is this a good time?

Name/Utility:

Introduction

1. What was your role in the effort to fulfill the disclosure requirements?

- ☐ Utility staff—management, policy perspective
- ☐ Utility staff—analyst, data perspective
- ☐ Non-utility stakeholder (describe: _____)
- ☐ Other (describe): _____

If, for any of my questions, you feel that someone else in your organization would be better suited to give an answer, feel free to direct me to that person.

Most of the questions ask you to rate your response using a five-point scale. In all cases, a response of “5” is the most positive and a response of “1” is the least positive.

Legislative Requirements

The following questions seek your views on the current legislative fuel mix reporting requirements and possible revision to those requirements. For each of these questions, a response of “5” indicates you strongly support the requirement or possible revision and “1” indicates your strong opposition to it. A response of “3” indicates your views are neutral or include some reasons to support and some reasons to oppose the requirement or possible revision.

Appendix

2. What is your position on maintaining the requirement for utilities to report their fuel mix information to their retail customers? Again, “5” indicates you strongly support this, and “1” indicates you strongly oppose it.

strongly oppose = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = strongly support

3. Using data currently available from state and federal sources, the state is able to provide information on air emissions associated with the fuel mix. Utilities would not need to report any additional information. What is your position on including air emissions data in the fuel mix report for each utility?

strongly oppose = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = strongly support

4. The statute currently specifies that utilities report their data to CTED by January 1 each year. If the reporting date were changed to April 1st, utilities would have an additional three months to provide data on the preceding year. What is your position on changing the reporting date to April 1st?

strongly oppose = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = strongly support

5. The statute currently gives utilities the option of reporting to their customers the net system mix of the US NW Power Pool rather than reporting the utility’s actual fuel mix. What is your position on this option?

strongly oppose = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = strongly support

6. The fuel mix disclosure requirement results in a statement of your utility’s fuel mix. Please tell me how well you think the final fuel mix statement represents your utility. A response of “5” indicates your belief that the fuel mix statement provides a very reasonable representation of what’s actually going on at your utility and a “1” indicates the statement provides a very poor representation.

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very reasonable representation

7. Do you have any suggestions on how to improve the content or value of the fuel mix disclosure label?

8. Do you have any other proposed changes to the statute?

Perceptions of Customer and Utility Value

9. Are you aware of any customer response to the fuel mix labels?

No ☐ Yes ☐

If Yes:

10. What type of response has occurred? (For example, have you been asked questions to clarify the information? Expressions of general interest? Requests to change the utility fuel mix? Other feedback?)

11. Has the fuel mix information been useful or helpful to your organization in any way?

No ☐ Yes ☐ don't know/no opinion ☐

12. Please explain.

13. Do you think the Fuel Mix Disclosure improves consumer understanding of the fuel source of their retail electric service?

No ☐ Yes ☐ don't know/no opinion ☐

14. Please explain.

Quality of CTED Service and Information

The next three questions concern the performance of the CTED staff you or your staff worked with during the fuel mix disclosure process. A response of “5” indicates your experience with CTED staff was “very good” and a response of “1” indicates your experience was “very poor”.

15. CTED staff communication about the fuel mix disclosure process

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

16. CTED staff responsiveness to your questions or requests

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

Appendix

17. CTED staff knowledge about utility generation and fuel mix issues

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

Please use the same scale to rate a few indicators of the quality of utility fuel mix information provided by CTED to each utility.

18. Accuracy of the information

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

19. Clarity of the information

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

20. Timeliness of the information

very poor = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

[==>If non-utility stakeholder: skip questions 21 through 30. Conclude with questions 31 through 33.]

Which of the following methods does your utility use to distribute the fuel mix label to your customers?

21. Bill Stuffer No ☐ Yes ☐ don't know ☐

22. Website No ☐ Yes ☐ don't know ☐

23. Newsletter No ☐ Yes ☐ don't know ☐

24. Other No ☐ Yes ☐ don't know ☐

25. If "other", describe:

26. Do you have any suggestions for improving the quality of service or information provided by CTED?

Process of Providing Data to CTED

*[=>If utility reporting only total sales to CTED: skip questions 27 through 30.
Conclude with questions 31 through 33.]*

The following questions explore your experience or that of your staff with providing data to CTED staff. Again, please use a five-point scale with “5” indicating the most positive response.

27. How reasonable were the expectations and timelines for reporting your fuel mix data? Would you rate them a “5”—very reasonable, a “1”—not at all reasonable, or something in between?

not at all reasonable = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very reasonable

28. How clear were the instructions for reporting your fuel mix data by generating facility and by BPA mix? Would you rate them a “5”—very clear, a “1”—not at all clear, or something in between?

not at all clear = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very clear

29. How effective was the web reporting system for submitting your fuel mix data? Would you rate it a “5”—very effective, a “1”—not at all effective, or something in between?

not at all effective = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very effective

30. How would you rate your overall experience providing CTED with your fuel mix data? Would you rate it a “5”—very good, a “1”—not at all good, or something in between?

not at all good = 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ = very good

Summary

31. Did you or your colleagues have any difficulty providing your data to CTED?
[If non-utility stakeholder, ask: Did you or your colleagues have any difficulty working with CTED?]

No ☐ Yes ☐ don't know ☐

Appendix

If Yes:

32. Please describe the difficulties you encountered.

33. Do you have any suggestions for improving the fuel mix disclosure reporting process?

Thank you.

Respondent's Name/List:

Please fax this questionnaire to Research Into Action at 503.281.7375 or send via email to Dulane Moran at dulanem@researchintoaction.com



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